

DRAFT

Statement of Work

The Respondent shall:

1. Prepare and submit the Final Report to EPA on or before _____.
- A. The Final Report shall include the following components:
 - I. PROJECT IDENTIFICATION
 - II. INTRODUCTION
 - III. SITE BACKGROUND
 - a. Site Location and Description
 - b. Operational History
 - c. Regulatory Compliance History
 - d. Summary of Incident
 - IV. ACTIONS TAKEN
 - a. Initial Mobilization and Response Activities.
 - b. Incident 1 (Tank Farm; Fire) Stabilization Activities
 - i. Secondary Containments
 - ii. Fire water
 - iii. Tank Inventory
 - iv. Substances
 - v. Sampling and Data Evaluation
 1. Surface Water (location/area)
 2. Surface Water (location/area)
 3. Soil
 - vi. Air Monitoring and Data Evaluation
 - c. Incident 2 (Water Operations) Stabilization Activities
 - i. Recovery Methods
 1. Active (by location/area)
 2. Passive (by location/area)
 3. Monitoring (by location/area)
 - ii. SCAT
 - iii. Sampling
 1. Sludge
 2. Surface Water
 - iv. Air Monitoring and Data Evaluation
 - d. Community Operations
 - i. Air Monitoring
 1. Methods
 2. Locations
 3. Results
 - ii. Air Sampling
 1. Methods
 2. Locations
 3. Results

- e. Action Levels
 - i. air monitoring action levels
 - ii. actions taken if action levels are exceeded
- f. Agencies Involved
 - i. Unified Command
 - ii. Supporting Agencies beyond UC

V. WASTE DISPOSAL AND TREATMENT

- a. Wastewater,
- b. Waste stream 2 (flam liquids)
- c. Waste stream 3 (flam solids)
- d. Non-Hazardous Solids

VI. SUMMARY

- a. Surface Water Sample Results Summary
- b. Wastewater Sample Results Summary
- c. Soil Sample Results Summary
- d. Air Sample Results Summary.
- e. Air Monitoring Results Summary

VII. LIST OF ATTACHMENTS

B. The Attachments to the Final Report shall include:

- Site Location Map
- Site Area Map
- Overall Site Area Map
- Location 1 Tank Farm Layout Map
- Drainage Path Layout Map
- Name of Waterway Impacted Layout Map
- Location 2 Map
- Staging Area Map / Decon Area Map
- Sample Location Maps
 - Surface Water Sample Location Map
 - Soil Sample Location Map
 - Monitoring Location Map
 - Air Monitoring / Sampling Location Maps
- Summary Tables of Analytical Results
 - Table 1 Surface Water Sample Analytical Results
 - Table 2 Soil Sample Analytical Results
 - Table 3 Foam Sample Analytical Results
 - Table 4 Waste Sample Analytical Results (or include with Final Waste Disposition Report)
 - Table 5 Air Sample Analytical Results
 - Table 6 Air Monitoring Analytical Results
- Analytical Data Summary Packages (If summary tables are not certified to be accurate; analytical data packages shall be provided. If certified summary tables are provided, analytical data packages shall be provided separately upon request by EPA)

- Air Sampling / Monitoring Data
 - Air Sampling Data
 - On-site / Tank Farm / include either industry area or separate ‘industry area’
 - Off-site in the response area
 - Community
 - Air Monitoring Data
 - On-site / Tank Farm / include industry area or separate ‘industry area’
 - Off-site in the response area
 - Community
 - Other protective measures
 - Wildlife supporting documentation
 - Photographic documentation (Video documentation may be provided)
 - Situation Reports (SITREPs)
 - Waste Report (available supporting documents to be attached in an organized fashion; indicate that the Final Waste Disposition Report will be provided upon completion of all waste disposal; summary waste streams (i.e. waste streams are by waste classification /waste characterization and not by vessel/truck type)
- C. The Final Report submittal shall include A good faith estimate of total costs or a statement of actual costs incurred in complying with the Section 311 CWA Order and this Settlement Agreement, including internal and third-party costs. The cost information may be provided either as a lump sum or broken down by categories. No back-up documentation is required to be provided.
- D. The Final Report shall include the following certification signed by a responsible corporate official of ITC or ITC’s Project Coordinator:
- “I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”
2. Prepare and submit the Final Waste Disposition Report to EPA on or before the date that is [90] calendar days following date on which all waste generated by Respondent during the removal action has been disposed of. The Final Waste Disposition Report shall include:
- A. A listing of waste stream quantities and types of materials removed off-site or handled on-site in connection with removal action and a discussion of removal and disposal options considered for those materials, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation relating to disposition of waste generated during the removal action (e.g., manifests, including the receiving

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facility's signature) and information concerning the quantity of incident-related wastewater treated on-site).

- B. The following certification signed by a responsible corporate official of ITC or ITC's Project Coordinator:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."